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Angeles Chapter

San Gabriel Valley Task Force and Puente-Chino Hills Task Force

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RE: Comments on Whittier Main Oil Field Development Project Revised Environmental Impact Report Public Draft

The following comments are submitted on behalf of the San Gabriel Valley and the Puente-Chino Hills Task Forces of the Sierra Club, Angeles Chapter in response to the Revised Draft Environmental Impact Report (DEIR) prepared for Whittier Main Oil Field Development Project.

The San Gabriel Valley Task Force was created to address environmental issues in the San Gabriel Valley. The focus of the San Gabriel Valley Task Force is on potential enhancements of natural areas, open space and recreational opportunities within the San Gabriel Valley, the watersheds of the San Gabriel River and the Rio Hondo, the foothills of the San Gabriel Mountains, and the hills defining the margins of the Valley. The mission of the Puente-Chino Hills Task Force is to work towards the preservation and biological integrity of the Puente-Chino Hills Wildlife Corridor which extends from the Whittier Narrows to the Santa Ana Mountains, as well as providing open-space and recreational activities within the Puente-Chino Hills.

The project site is an especially sensitive and important portion of both the Puente Hills Landfill Native Habitat Preservation Authority Preserve (Preserve) and the greater Puente-Chino Hills region. As such, we continue to oppose this project and all alternatives with their associated, significant and unavoidable impacts on habitats and wildlife. The use of the Northern Access Road is unacceptable due to the impacts on the core area of the Habitat Preservation Authority

We have reviewed the RDEIR for renewed drilling and oil production from lands owned by the City of Whittier and located within the Preserve. We oppose the proposed project and all alternatives described in the RDEIR for the reasons described in the following comments.

- The Sierra Club believes that “no leasing, renewing of unworked leases, development facilities such as pipelines, or disruptive exploratory work such as drilling should be allowed in existing or potential conservation system units where these activities could lead to the destruction of the values the systems were designed to protect” (Sierra Club, National Policy).
- The Task Forces are alarmed at the impacts on special status species by permanent grading for pads, processing equipment, and permanent upgrading of roads with associated fuel modification clearings on each side. The USFWS designates the Project Site as critical habitat for the federally threatened coastal California Gnatcatcher. The project would permanently destroy Coastal Sage Scrub and riparian habitat for this protected species. In addition, the La Canada Verde

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Watershed, along the North Access Road, supports 16 to 18 sensitive or indicator species (RDEIR 4.2-37), and the Arroyo Pescadero Watershed, near the Loop Trail Road, supports 19 to 22 sensitive or indicator species (4.2-38). This is not weedy scrub land.

- The protocol survey for the Least Bell's Vireos (Appendix C-1) was conducted in 2010. But, the Least Bell's Vireo population in the nearby protected habitat of Chino Hills State Park has increased substantially in 2011, with many new mating pairs. Therefore, a new survey should be conducted to reflect the updated conditions in the watershed.
- The proposed oil drilling and production contradicts the mission statement of the Puente Hills Landfill Native Habitat Preservation Authority which is "dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity with the primary purpose to protect the biological diversity". In addition, the Preserve is currently within a proposed Los Angeles County Significant Ecological Area.
- The proposed project and use of the Northern Access Road would affect the flora and fauna of the Core Habitat Management Zone of the Preserve—considered to be an important wildlife nursery site for deer and bobcats, which use the proposed project site in the highest density in the Preserve (RDEIR 4.2-35), as well as habitat for many other species. Core habitat areas are critical for maintaining wildlife populations in fragmented habitat corridors. The Core Habitat includes areas that generally are not open to the unsupervised public and are to provide undisturbed habitat for wildlife. Permissible activities are only to include "authorized biological survey and some restoration and/or invasive species removal, but no unsupervised public access" (Habitat Authority Resource Management Plan-RMP (RDEIR 4.2-35). The proposed project is incompatible with this RMP. Use of the Northern Access Road is unacceptable. Paving of this road to 20 feet in width, plus 10 feet on either side impacts a 40 foot wide pathway through the Core Habitat zone.
- The proposed project will interfere with movements of wildlife through and within the Preserve, as the undisturbed, quiet, and dark Core Habitat will be considerably smaller if the proposed project is allowed to go forward. Continued drilling and well maintenance will extend these impacts for the life of oil operations in the project areas. To suggest that because large mammal species coexisted with extensive and unmitigated oil operations in the past (RDEIR 4.2-53) is to ignore the fact that the available habitat was much more extensive in the past. This comment requires a study of the cumulative effects of shrinking habitat due to development before it can be concluded the proposed project is "not anticipated to substantially inhibit the bobcat and other large mammal species' use of the La Canada Verde watershed, either as a nursery site or as a movement corridor" (RDEIR 4.2-53).
- The Task Forces are concerned about on-site impacts of drilling, construction, maintenance, and pipeline installation, including light pollution, noise, air quality impacts, and traffic on the affected part of the Wildlife Corridor. While these impacts would be greatest during early stages of the project, they would continue for the life of the project. Drilling 60 wells, one at a time, each taking about 30 days, will spread just the drilling impacts over approximately 5 years. Vibrations from drilling, pumping, construction, and transportation are not fully addressed. Drilling takes place 24 hours a day with night lighting and vibration over a period of potentially 5 years. This will impact activities of nocturnal animals both large (i.e. bobcats, coyotes) and small (i.e. various species of bats). Maintenance of wells would cause impacts throughout the life of the oil operations in the Preserve. To the extent that these edge effects impact the wildlife use of

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the existing habitat, it is a taking of that habitat whose mitigation should be replacement of like habitat.

- Table 4.2-3, which identifies the areas of project impacted plant communities (RDEIR 4.2-40) does not include any acreage for wildlife edge effects. The impact on plant communities may be as described, but the impact goes far beyond that to also impact wildlife. There are edge effects from the proposed project, especially the North Access Road, that amount to a permanent taking of land that must be replaced with like habitat.
- Section 4.4 Geological Resources is wholly inadequate. Although long descriptions of conditions that could exist are included, no specific data is given for various geological hazards for the proposed site, pipeline areas or alternatives. Geotechnical studies were reportedly done for the previous proposed location but were not available in the DEIR. The proposed site in this RDEIR is not the same and no new site specific geotechnical studies were completed (Statement on 4.4-26 in GR-1c). Site specific geotechnical studies must be included in the FEIR and before final decisions on the project are made so they can be evaluated by outside parties.
- There is no map to indicate locations of faults relative to the project locations. Analysis of earthquake hazards is inadequate. Most recent data on seismic hazards must be included and documented in RDEIR. It is impossible to determine what the hazards are without a geotechnical report for the proposed site and pipelines. Maximum ground accelerations for the project site (Table 4.4-1) should include Puente Hills Blind Thrust. No discussion of the Whittier-Elsinore Fault in the area is included.
- The analysis of cumulative impacts on the Puente-Chino Hills Wildlife Corridor due to fragmentation of habitat is thin, but the result is fairly clear: “Cumulative impacts to wildlife movement in the general area would be significant” (RDEIR 4.2-65). But the mitigation measures of finally bringing the Sycamore Canyon oil operations up to standards and coordinating construction schedules with the Tehachapi Renewable Transmission Project are wholly inadequate. Major losses of habitat have occurred in this area due to housing development, local landfills, golf courses and cemeteries. The Tehachapi Renewable Transmission project will take place during proposed oil development. Potential development of the Aera property would have major impacts to connectivity along the Puente-Chino Hills Wildlife Corridor. The National Park Service is currently studying the feasibility of creating a national recreation area that potentially could include the Puente-Chino Hills. The Whittier Hills Oil project would degrade the potential of this area to be included in such a federally designated national recreation area. Adequate mitigation measures include the areal replacement of habitat to offset these cumulative impacts.
- The impacts of using the Lambert Right of Way to the new Whittier Greenway Trail along Lambert between Mills and Laurel Ave where the trail diverges from Lambert must be addressed. Is the trail affected by proposed pipeline development?
- The potential effects of accidental spills of toxic drilling muds, fluids, or oil, including contaminated formation water must be described. Such accidents could endanger the flora and fauna of this important habitat, impact special status species, and affect surrounding residential areas.
- The potential for fire associated with oil drilling, production and maintenance must be addressed. While it is normal for chaparral areas to burn, the increased frequency of fire escaping even to

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just a portion of the Preserve could lead to permanent changes in the habitat as well as risk to nearby residential areas.

- Cumulative GHG and global warming impacts are inadequately addressed by the RDEIR. The project, and the products of the project, will contribute to greenhouse gas emissions and to global warming. Mitigations should include offsets.
- Recreational use of the trails and outdoor education will be interrupted during this project--development that would particularly affect Arroyo Pescadero and the Core area. The major activity in the Preserve is hiking. A potential long-term closure of the Arroyo Pescadero trail system will take place due to this proposed project. This area is heavily used by hikers, equestrians, and Habitat Authority educational programs. The oil development and production will diminish the quality of outdoor recreation due to noise which will exceed General Plan levels, vibrations, exhaust, and dust generated for the life of the project. The public uses this area to escape from the noise and disturbance of the urban environment—not to encounter noise of drilling, trucks etc. Signs describing to hikers why their hike has been ruined (RDEIR 4.14-11) are, to say the least, inadequate.
- All of the Environmental Justice analysis is based on 2000 census data. Since 2010 census data is available, the analysis of this section needs to be redone to include data that reflects the community today and not the one ten years ago. Shifting of access to the project site from Catalina Ave. to Penn St., a longer more indirect route, shifts the burden of this project from a higher end residential area to a more congested area of mixed residential and multiple unit housing.
- The traffic analysis must be redone for the FEIR. The data presented was obtained during final exams at Whittier College (information from June 30, 2011 meeting). Student attendance is considerably lower during final examinations than during regular sessions.

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Project Alternatives

The North Access Road is totally unacceptable and should not be included as part of the project.

- From a common sense standpoint, it makes no sense to access the project from miles away through sensitive habitat and one residential neighborhood just to export the impacts from another residential neighborhood. Reasons why the North Access Road is unacceptable are detailed in the previous comments above.
- The preferred access road should be Catalina Avenue. Much mitigation is detailed in the RDEIR to try to make a silk purse out of the sow's ear that is the North Access Road, but everyone throws their hands up in any efforts to make Catalina Road feasible as the primary access road for the proposed project. It is by far the shortest and most direct route.

Use of the Loop Trail as described in the RDEIR is totally unacceptable.

- It is also proposed as a secondary fire access road, which would mean a 20 foot road with 10 foot fuel modification clearances on either side. This represents a major incursion through yet another part of the Preserve Core Habitat and existing recreational trails and viewsheds.
- The secondary or primary access road should be an amended Loop trail which drops south as soon as feasible after the road leaves the drilling site. The objective should be to use as much of the existing access road on the south boundary of the Habitat Authority as possible and continue east to Colima.

Although we do not believe this project should be approved, if it is considered further by the City of Whittier, the following mitigation measures should be included:

- As mitigation to prevent damage to the Preserve, funding from Matrix must be required for hiring Habitat Authority staff equivalent to two full time equivalent positions which specialize in compliance monitoring to monitor all project activities.
- Funding from Matrix must be included to train oil company and contract workers on this project about the environmental/biological concerns associated with the Preserve.
- Funding from Matrix should be designated for community and educational outreach programs in the Preserve to account for the loss of recreational and educational opportunities due to this project.
- Requirements should be included to minimize auto and truck traffic through carpooling of workers and to limit, as much as possible, truck traffic through neighborhoods and to address parking issues within the Preserve or community. There should be strict limits established on the number of allowed vehicle trips, with meaningful monitoring and fines if limits are exceeded.
- The North Access Road should never be used at night. Any night time traffic should access the site through Catalina Avenue.

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- As mitigation for loss of Core Habitat, funds from this project should be stipulated for Preserve management and purchase of lands before the project is started to complete the continuity of the Puente-Chino Hills Wildlife Corridor.
- Up-front funding for emergency response and cleanup of any toxic materials should be included for the life of the project. Funding should also be included for cleanup and restoration of the entire project after completion.
- In addition to the improvements to the Service Tunnel wildlife undercrossing, the feasibility of other animal movement corridors either under or over Colima should be studied, and if appropriate, built.
- There should be on-site fire apparatuses appropriate for an oil drilling site.
- Conservation easements should be put on all Habitat Authority lands which are owned by the City.

Because of the above concerns, we believe that renewed drilling in the Whittier Hills is unacceptable.

We respectfully submit these comments.

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